

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA**

IN RE:)
) Case No: 7:23-cv-00897
CAMP LEJEUNE WATER LITIGATION)
) JOINT MOTION FOR EXTENSION OF
This Document Relates To:) PHASE III DEADLINES FOR TRACK 1
) PARKINSON'S DISEASE PLAINTIFFS
Edgar Peterson, IV v. U.S., 7:23-CV-1576)
Gary McElhiney v. U.S., 7:23-CV-1368
Diane Rothchild v. U.S., 7:23-CV-858
Robert Welch v. U.S., 7:23-CV-1503
Richard Sparks v. U.S., 7:23-CV-682

Pursuant to Federal Rules of Civil Procedure 6(b)(1) and 16(b)(4), and good cause having been shown, the United States and the Plaintiffs' Leadership Group ("PLG") (collectively, "the "Parties") jointly move this Court to extend the time for the completion of Phase III Expert Discovery for all Track 1 Trial Cases alleging Parkinson's Disease by 30 days. The extension would apply to all experts offering opinions in Phase III as it relates to the five Parkinson's Disease Plaintiffs in Track 1 listed above.

The United States made PLG and the Court aware at the January 13, 2025 Status Conference that its Parkinson's Disease expert had an unexpected medical event. See ECF No. 315 at 3:15-19. As a result, the United States' expert is no longer available and the United States had to unexpectedly retain new experts to opine on the medical conditions of the five Parkinson's Disease Plaintiffs. In addition to these new medical experts' opinions, the United States has additional experts whose opinions rely on the opinions of the medical experts. The Parties agree that a 30-day extension is reasonable given the above circumstances.

The Parties will work collaboratively to schedule the depositions of both Parties' experts throughout the June 13 to August 12 time period to prevent the depositions of all of the Phase III

Parkinson's Disease experts from taking place on the eve of both Parties' briefing deadline. Both Parties have committed to scheduling their experts' depositions as early as is practically possible given the Parties' and experts' schedules.

The United States also agrees to immediately disclose the number of Phase III Parkinson's Disease testifying experts, and to further disclose the names and CVs of such testifying experts on or before April 8, 2025.

A proposed order is attached.

DATED this 7 day of March 2025. Respectfully submitted,

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